

GIACCHINO J. RUSSO and ASSOCIATES, P.C.
Attorneys at Law
35-28 Farrington Street
Flushing, N.Y. 11354
(718) 460-2847, fax (718) 460-4647
Email: Giacchino.russo@aol.com

July 15, 2021

Honorable Lewis J. Liman
Southern District of New York
United States Courthouse
500 Pearl Street
New York, N.Y. 1007

Re: United States v. Chaoyue Zhao, 20 Cr, 129

Your Honor:


As you are aware, I am the attorney for Chaoyue Zhao in the above referenced proceeding. I am writing to you to request a fourth extension of the time within which to make pretrial motions in this case. The current deadline for the Defendant to file is July 16, 2021.

I am requesting, with the consent of the United States Attorney, a final 45 day extension within which to submit pre-trial motions in this matter; specifically until August 30, 2021.

The Government has informed me that there is an additional portion of disclosure. It will be sorting out from the large case setting and making available to us shortly. Additionally, in hopes of the Defendant's impending release to home confinement, my client will then be able to fully assist in his defense.

Thank you for your consideration in this matter.

Sincerely yours,


Giacchino J. Russo, Esq


GJR/hq

Cc: Sebastian Swett, AUSA (by ECF), Aline Flodr, AUSA (by ECF)

REQUEST GRANTED.

The time for defendant to submit pretrial motions is extended to August 30, 2021. Government response due by September 13, 2021. Motion Hearing rescheduled for September 20, 2021 at 12:00PM in Courtroom 15C at the 500 Pearl Street Courthouse. The Court, with consent of all parties, excludes time until September 20, 2021 under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interests of justice outweigh the interests of the public and the defendant in a speedy trial, in that the time between now and September 20 will allow additional time for defendant to prepare and make any pretrial motions. 7/19/2021 SO ORDERED.

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LEWIS J. LIMAN
United States District Judge